

## **EXHIBIT 22**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X \*

NATIONAL ASSOCIATION FOR THE \*  
ADVANCEMENT OF COLORED PEOPLE, \*  
SPRING VALLEY BRANCH, JULIO \*  
CLERVEAUX, CHEVON DOS REIS; ERIC \*  
GOODWIN; JOSE VITELIO GREGORIO; \*  
DOROTHY MILLER; HILLARY MOREAU; \*  
and WASHINGTON SANCHEZ \*

INDEX NO:  
17-CV-8943

PLAINTIFFS, \*

vs \*

EAST RAMAPO CENTRAL SCHOOL \*  
DISTRICT and MARYELLEN ELIA, In \*  
Her Capacity as the Commissioner \*  
of Education of the State of New \*  
York, \*

DEFENDANTS. \*

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VIDEOTAPED DEPOSITION of SHAYA GLICK  
Montebello, New York  
Tuesday, December 4, 2018

Reported by:

Mary Agnes Drury, RPR, NYACR, CLR

JOB NO. 151980

1 SHAYA GLICK

2 from Latham & Watkins representing the 10:35  
3 plaintiffs. 10:35

4 MR. MANGAS: Russell Mangas, Latham 10:35  
5 & Watkins representing the plaintiffs. 10:35

6 MR. LYNCH: Good morning, Dennis 10:35  
7 Lynch, representing this particular  
8 non-party witness, Mr. Glick.

9 MR. BUTLER: David Butler  
10 representing the defendant.

11 S H A Y A G L I C K,

12 called as a witness, having been duly  
13 affirmed by a Notary Public, was examined  
14 and testified as follows:

15 MR. LYNCH: This is Mr. Lynch. 10:36  
16 Before we begin, prior to getting started, 10:36  
17 I want to indicate that we made a 10:36  
18 production of records that we understood 10:36  
19 was responsive. 10:36

20 This Friday after Shabbat started, I 10:36  
21 did receive a communication from counsel 10:36  
22 for the plaintiffs that they believe the 10:36  
23 production was not completely responsive. 10:36

24 The first business day after getting 10:36  
25 that, that I could get reach my client; and 10:36

1 SHAYA GLICK

2 they ask that in applications. I know I'm 11:00  
3 not Indian, and I know I'm not an 11:00  
4 African-American. I know I'm not an 11:01  
5 Hispanic-American, I don't know, Caucasian 11:01  
6 or I don't know. 11:01

7 BY MS. MATYSTIK:

8 Q. When you do fill out those forms, 11:01  
9 what do you typically select? 11:01

10 THE WITNESS: I struggle. I try 11:01  
11 to -- 11:01

12 MR. LYNCH: Objection. 11:01

13 Q. Would you generally identify as 11:01  
14 being white? 11:01

15 A. Yes, but my ancestry is from Africa, 11:01  
16 you know. All the way back to Moses and Erin, 11:01  
17 we go back to Africa. You know, my 11:01  
18 grandparents were born between the Euphrates 11:01  
19 and the Tigris, if you know where that is; they 11:01  
20 were -- and Jacob.

21 Q. Yeah. So you're a member of the 11:01  
22 Hasidic community; is that correct? 11:01

23 MR. LYNCH: Objection. 11:01

24 THE WITNESS: I'm wondering who came 11:01  
25 up with this phrase, "Hasidic community." 11:01

1 SHAYA GLICK

2 A community is a community. A community of 11:01  
3 East Ramapo would rather fit my 11:01  
4 description.

5 Q. So for your religion, how do you 11:01  
6 identify yourself? 11:02

7 A. I'm a Jew. 11:02

8 Q. Okay. Are you -- my understanding 11:02  
9 is there are different sort of the sects within 11:02  
10 Judaism or there may be Orthodox or -- 11:02

11 A. But there is so much fake news out 11:02  
12 there about this, so... 11:02

13 Q. Well, so I'm asking you, is there 11:02  
14 such a thing as being Orthodox Jewish? 11:02

15 A. I would call it hybrid. I'm 11:02  
16 Hasidic, Orthodox. I wouldn't say conservative 11:02  
17 but modern Orthodox Jew, you know they... 11:02

18 Q. And in your mind, what does it mean 11:02  
19 to be a modern Orthodox Jew? 11:02

20 A. To every day wake up in the morning 11:02  
21 and sanctify the name of God. Help people. 11:02

22 There is a world to come, and I 11:02  
23 believe in that. Everyday that I help a poor 11:02  
24 kid get an education, every day that I can help 11:02  
25 a family put bread on a table, and every day 11:02

1 SHAYA GLICK

2 Q. Do you have any understanding what 11:47  
3 Chaim Saperstein might have meant when he wrote 11:47  
4 the Grossman slate? 11:47

5 A. No. 11:47

6 Q. Have you ever heard that term before 11:47  
7 "slate"? 11:47

8 A. No, never. Even now, I don't know. 11:47  
9 It's having -- it must mean the side that won. 11:47

10 Q. The side that won. 11:47  
11 Do you recall if Mr. Grossman was 11:47  
12 running with anyone? 11:48

13 A. Not really. 11:48

14 Q. Did you vote in that election? 11:48

15 A. I don't remember. 11:48

16 Q. So is it -- so right after this you 11:48  
17 respond, couldn't have done it without you all 11:48  
18 participating. 11:48

19 Does that mean, couldn't have won 11:48  
20 the election? 11:48

21 A. I don't know what I was referring to 11:48  
22 at that time, but I guess so. 11:48

23 Q. So this is May 17, 2017. Would this 11:48  
24 have been around or at the time of a school 11:48  
25 board election? 11:48

1 SHAYA GLICK

2 MR. LYNCH: Objection as to guesses. 11:48

3 THE WITNESS: I really don't 11:48

4 remember what day the election was, so I 11:48

5 wouldn't know. 11:49

6 Q. It looks like at the top Harry 11:49  
7 Grossman says, this election was huge. Does 11:49  
8 that refresh your recollection as to when it 11:49  
9 might have taken place? 11:49

10 A. It could be, yeah. 11:49

11 Q. So your testimony is you don't 11:49  
12 remember if you voted in this election, and you 11:49  
13 can't recall who also ran for the board with 11:49  
14 Grossman? 11:49

15 THE WITNESS: Correct. 11:49

16 MR. LYNCH: Objection. You may 11:49  
17 answer. 11:49

18 Q. And you also don't know what the 11:49  
19 Grossman slate is? 11:49

20 MR. LYNCH: Objection. 11:49

21 THE WITNESS: No. I wouldn't know 11:49  
22 what he's referring to them as Grossman 11:49  
23 slate, I wouldn't know that. 11:50

24 Q. So when you say couldn't have done 11:50  
25 it without all of you participating, what is it 11:50

1 SHAYA GLICK

2 that you did, what is it that you could have 11:50  
3 done without? 11:50

4 MR. LYNCH: Objection. 11:50

5 THE WITNESS: Couldn't is the 11:50  
6 community. I'm referring to -- I'm reading 11:50  
7 it back. So again, I'm going to try to 11:50  
8 interpret whatever I'm thinking now. You 11:50  
9 can -- couldn't have done without all of 11:50  
10 you participating; meaning, I guess, all 11:50  
11 the people in this chat maybe. 11:50

12 MR. LYNCH: Objection as to guesses. 11:50

13 THE WITNESS: I'm guessing, because 11:50  
14 I wouldn't remember the, you know, the -- 11:50

15 BY MS. MATYSTIK: 11:50

16 Q. So you don't have any recollection 11:50  
17 as to who you voted for in this election? 11:50

18 A. Or if I voted at all. 11:50

19 Q. If you voted at all. 11:50

20 Do you recall whether you advocated 11:50  
21 for any particular candidate that was running? 11:51

22 A. I'm sure I was advocating for the 11:51  
23 candidate that would restore bussing and peace 11:51  
24 and harmony in the community, that type of 11:51  
25 thing. 11:51



C E R T I F I C A T E

STATE OF NEW YORK )

) ss.:

COUNTY OF ONONDAGA )

I, Mary Agnes Drury, a Notary Public  
within and for the State of New York, do  
hereby certify:

That SHAYA GLICK, the witness whose  
deposition is hereinbefore set forth, was  
duly sworn by me and that such deposition  
is a true record of the testimony given by  
such witness.

I further certify that I am not  
related to any of the parties to this  
action by blood or marriage; and that I am  
in no way interested in the outcome of this  
matter.

IN WITNESS WHEREOF, I have hereunto  
set my hand this 8th day of December, 2018.



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Mary Agnes Drury

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SHAYA GLICK

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